DOCUMENT RESUME

ED 411 120 RC 021 137

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TITLE	Improving Education for Indian Students in the Context of Education Reform: Challenges and Obstacles.
INSTITUTION	Policy Studies Associates, Inc., Washington, DC.
SPONS AGENCY	Department of Education, Washington, DC. Office of the Under Secretary.; Department of Education, Washington, DC. Planning and Evaluation Service.
PUB DATE	1997-05-00
NOTE	53p.
CONTRACT	EA94053001
PUB TYPE	Reports - Evaluative (142)
EDRS PRICE	MF01/PC03 Plus Postage.
DESCRIPTORS	Agency Cooperation; *American Indian Education; Coordination; *Culturally Relevant Education; Educational Objectives; *Educational Planning; Elementary Secondary Education; *Grants; *Program Proposals; *Technical Assistance
IDENTIFIERS	*Ethnic Heritage Studies Program

ABSTRACT

Local education agencies (LEAs) that receive Title IX formula grants are required to develop comprehensive plans to meet the culturally related academic needs of American Indian students and to promote their achievement of high academic standards. This report analyzes and assesses the quality of the comprehensive plans submitted by Title IX grantees in 1995-96 (the first year of the requirement). A detailed review was conducted of 138 of the approximately 1,300 Title IX formula grant applications submitted in 1995-96. Information was also gathered through telephone interviews with representatives of local and state education agencies, state and national Indian education organizations, and former Indian Education Technical Assistance Centers. Almost half of the applications failed to mention a comprehensive plan. Over half did not refer to content and performance standards; coordination among federal, state, and local programs; and plans to assess the performance of all American Indian students (not just project participants). About half did not relate Indian education goals to those of other state and local plans, and did not refer to professional development. Almost half did not mention plans to share student assessment results with the community. Findings are outlined on the LEAs' planned activities in the following areas: meeting the culturally related academic needs of Indian students; professional development; aligning goals with those of other improvement plans and with state and local standards; program coordination; performance goals and benchmarks; student assessment; and communication to parents and community. Examples demonstrate how some projects are fulfilling Title IX expectations in each area. Suggestions for improving Title IX comprehensive plans focus on technical assistance, agency cooperation, and broadened participation in planning. (SV)

ED 411 120

IMPROVING EDUCATION FOR INDIAN STUDENTS IN THE CONTEXT OF EDUCATION REFORM: CHALLENGES AND OBSTACLES

May 1997

Prepared Under Contract by:

Policy Studies Associates, Inc.
Washington, DC 20009

Contract No. EA94053001

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RC 021137

IMPROVING EDUCATION FOR INDIAN STUDENTS IN THE CONTEXT OF EDUCATION REFORM: CHALLENGES AND OBSTACLES

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U.S. Department of Education

Contract # EA94053001

May 1997

The opinions, findings, conclusions, and recommendations expressed in this report are those of the authors and do not necessarily reflect the views of the U.S. Department of Education.

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Executive Summary

Under the provisions of Title IX of the reauthorized Elementary and Secondary Schools Act (ESEA), local education agencies (LEAs) that receive Title IX formula grants are required to develop comprehensive plans that describe their strategies for meeting the culturally related academic needs of American Indian students and for promoting their achievement of high academic standards. Specifically, the comprehensive plans are required to:

1. Describe programs and activities for meeting the culturally related academic needs of Indian students
2. Be consistent with and promote the goals set forth in state and local improvement plans (e.g., plans prepared pursuant to Goals 2000, ESEA Title I)
3. Include student academic content standards that are based on challenging state academic standards
4. Include performance goals and benchmarks based on challenging state standards
5. Explain how federal, state, and local programs will be coordinated to meet the needs of American Indian students
6. Describe the professional development that will be provided to prepare teachers and other school professionals to work with American Indian students
7. Describe how the progress of all American Indian students will be assessed
8. Describe how the results of the assessment will be shared with the Indian parent committee and the community served by the LEA, and how the findings of previous assessments are being addressed.

The study described in this report examined and assessed the quality of the comprehensive plans that were developed by Title IX grantees and submitted as part of their 1995-96 formula grant applications. This was the first year that grantees were required by law to develop comprehensive plans and, as a result, the timing of this study may have been premature. However, the progress of these plans will be analyzed in future years in order to assess the extent to which the initial problems and deficiencies identified in this report are addressed.

Over a period of approximately six months, the study team collected data through (1) a review of 1995-96 formula grant applications and comprehensive plans (a total of 138) and (2) telephone

interviews with representatives from 19 LEAs, four state and national Indian education organizations, nine state education agencies (SEAs), and three former Indian Education Technical Assistance Centers. The team analyzed these data to determine the adequacy and the quality of the comprehensive plans. In addition, analyses were conducted to indicate (1) the factors that facilitated or obstructed development of the plans, (2) the issues of concern to grantees with regard to the plans, and (3) the explanations of patterns observed in the content of the plans.

Factors that Have Impeded the Development of Comprehensive Plans

Our analysis revealed that several important contextual issues helped to shape the content and quality of the comprehensive plans in our sample. A particularly significant issue is that some grantees were not aware of the requirement to include a comprehensive plan in their Title IX application and, as a result, failed to discuss most, if not all, of the required issues. Others were aware of the new requirement but were unclear about what type of information to include and how to present it. In addition, grantees had myriad questions regarding the roles and responsibilities of Title IX staff and other district staff with regard to the development and implementation of the comprehensive plans.

Variations in the quality of the comprehensive plans can also be attributed to grantees' concerns about the impact that coordination and collaboration with other education programs might have on the nature and quality of Title IX services. Key concerns were that coordination might lead to Title IX funds being diverted to non-Indian students--making fewer resources available for American Indian students--and that American Indian students' cultural needs might be overlooked if program lines were blurred through coordination and integration.

Some grantees were unable to complete all of the components of the comprehensive plan because information on Goals 2000, consolidated plans, and content and performance standards development were not available at the time the formula grant application was completed. Grantees' ability to complete the plan was also hindered by the isolation of Title IX projects and staff within many districts. This situation made it difficult for communication about individual project and districtwide plans and activities--an essential prerequisite for comprehensive planning--to occur among Title IX staff and the staff of other programs.

Summary Features of the Title IX Applications and Comprehensive Plans

Almost half of all Title IX applications that we reviewed failed to mention a comprehensive plan.[1] Although slightly more than half referred to a comprehensive plan, significant variation was found within this group with regard to the detail and quality of the information provided. For example, some stated that their comprehensive plan was being developed; others previewed what was likely to be included in this document. Other grantees suggested that they had conducted comprehensive planning, but our analysis revealed that they had addressed few, if any, of the required issues. While some did provide details on several components of their comprehensive plan, few addressed all of the required issues adequately.

More than half of all the applications and comprehensive plans did not refer to: (1) content and performance standards; (2) coordination among federal, state, and local programs; and (3) their plans to assess the performance of all American Indian students (i.e., not just those being served directly by Title IX). About half did not refer to the relationship between the goals of Indian education and those of other state and local plans or to professional development. Almost half made no mention of their plans to share student assessment results with the community.

The following sections briefly outline our findings on LEAs' planned activities in the key areas that are to be addressed by the comprehensive plan.

1. Meeting the culturally related academic needs of Indian students

The Title IX applications and comprehensive plans tend to describe cultural enrichment and academics as separate project activities, and, with few exceptions, LEAs are vague on how they would meet the requirement to address the "culturally related academic needs" of Indian students. The academic-related activities that are described typically include academic tutoring, dropout prevention, counseling (career, social, health), monitoring, and providing academic support for absentees. Very few grantees describe tutoring programs that use cultural materials and topics to teach academic subjects and develop basic skills. On the whole, cultural activities are described as

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[1] Although the term "comprehensive plan" may not have appeared in an application, a grantee may have discussed one of the required components of the comprehensive plan (e.g., professional development) somewhere else in their application--typically, in their project narrative. Thus, even though an application did not include a section entitled "comprehensive plan," it may still have satisfied one or two of the plan requirements.

extracurricular/enrichment events that occur after school, during the summer, or as activities apart from the regular school program.

Grantees separate culture and academics for various reasons. A primary reason is that the term "culturally related academic needs" is not clearly defined in the Title IX application, and most grantees appear to perceive culture and academics as separate domains. In addition, the Title IX application is unclear about whether grantees are required to integrate Title IX with the regular school program. Also, local Goals 2000 plans, districtwide initiatives, and school improvement plans may not emphasize a need to integrate culture and native languages with academic standards and student academic learning.

2. Providing professional development for teachers and other school staff

The applications we reviewed provide only a vague description of professional development opportunities. Information on which staff will receive training, who will serve as trainers, and the specific content and duration of training tends not to be presented. In fact, only about half of the applications in the study sample refer to professional development. Among those that did, few include more than a sentence or two of information.

At present, the professional development directed to non-Indian school staff tends to focus on enhancing cultural sensitivity or awareness of American Indian customs and culture. For example, several applications stated that members of the local Indian community (e.g., tribal elders, parents) are invited to orient new teachers and provide them with cultural awareness training. Others noted that Title IX staff share their knowledge of local American Indian customs and history with non-Indian school staff and suggest instructional methods and other classroom strategies that are likely to be effective with American Indian students. Professional development for Title IX staff--who are typically American Indian--tends to focus more on instructional techniques and project management strategies. Several districts also invite parents to participate in staff training so that they can assist their children with their schoolwork at home.

3. Developing shared goals with other state or local improvement plans

We found limited information on the consistency between Title IX and other state or local plans. In many applications, there is no discussion of state and local improvement plans and no

mention of how the Title IX comprehensive plan may be consistent with the goals stated in those documents. When addressing consistency across plans, grantees typically state that consistency exists, but they provide no details or specifics about how the plans are linked.

4. Establishing goals for American Indian students that are consistent with state and local content standards for all students

Among the Title IX applications reviewed, more than three quarters did not include state or local content standards. Telephone interviewees indicated that content and performance standards may not have been addressed in the applications because: (a) Title IX project staff may not be aware of local or state content and performance standards; (b) grantees may not understand how to apply the language of academic content standards in the context of their Title IX project--especially if their project goals and activities are not specifically academic; and (c) Title IX staff and parents have not been informed about how culture and academics can be connected to high standards and student performance and content goals. In general, applicants typically tie Title IX project objectives to specific project activities rather than to content and performance standards. These objectives tend to be described as behavioral or skills-oriented. For example, objectives are often based on student participation and completion rates in project activities and on school attendance and achievement on tests.

5. Coordinating Title IX with other federal, state, and local programs

Although our review of applications indicates that Title IX projects may be coordinating with a variety of federal, state, and local programs in some districts, we found few, if any, details describing how collaboration is occurring. For example, although some Title IX projects are located in Title I schoolwide sites and will be connec.ed to the schoolwide plan, details and examples were generally not presented to describe how Title IX fits into the Title I schoolwide initiative. Similarly, although some applications note that Title IX personnel are members of schoolwide committees, no descriptions are offered on how their roles and responsibilities will be linked to schoolwide programs and objectives.

The scarcity of information on this issue in the Title IX application appears to result from (a) limited local understanding of the motives and methods for coordination, and (b) doubts about the potential effectiveness of this strategy for improving services to American Indian students. In the absence of a working model to help define what a comprehensive plan and coordination should look

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like in schools, district staff find it difficult to understand how Title IX will fit into the larger picture and how American Indian students will benefit from coordination.

6. Identifying performance goals and benchmarks for attaining state content and performance standards

Developing goals and objectives that are related to project activities has always been a requirement in the Title IX application. However, even though the majority of the applications we reviewed referenced performance goals and benchmarks, none were connected to either state content or performance standards. For the most part, Title IX performance goals and benchmarks address only project-level, student-focused goals that are behavioral or skills based--and often unchallenging.

The goals and benchmarks that are set are often based on participants' performance on standardized tests. In some instances, however, the goals that are set reflect either very low, or overly ambitious, expectations for students.

7. Assessing American Indian students' performance

Although almost every application we reviewed described how the progress of Title IX participants would be assessed, fewer than half indicated whether they intend to assess the progress of all American Indian students in their district, as is required. One possible explanation for this pattern is that some Title IX staff focus on project participants and regard non-participants as beyond their responsibility.

Title IX projects rely primarily on student grades, attendance records, standardized test scores, pre/post test scores, teacher logs, and, to a lesser extent, student or parent surveys to determine student progress. In nearly all of the applications in our sample, assessment focused on academic-related outcomes and on the use of standardized tests, in combination with classroom performance, as evidence of student and program performance.

In addition to describing their plans for assessing student achievement, some applications also included information on how the results of the student assessment have been, or will be, used. Typically, these applications indicated that: (a) assessment helps to identify areas of student weakness and to guide teachers in planning future instruction; (b) the assessment process helps to determine

whether American Indian students are attaining state content and performance standards; and (c) the assessment process is a tool for project management that can help identify obstacles and solutions related to the organization and operation of the project.

8. Communicating performance results to parents and the community

Almost half of the Title IX applications in our sample did not discuss a strategy for communicating students' performance results to parents or the community. Most provided brief, general information on dissemination strategies that were similar among projects. These methods include sharing regular (quarterly, monthly) project evaluations and performance results through some of the following events: parent committee meetings, public hearings, school board meetings, meetings of tribal leadership or governance boards, parent workshops, school open-houses, and parent-teacher conferences. Others disseminate information via newsletters or other documents.

Approaches for Improving Title IX Comprehensive Plans

Since this review of LEA comprehensive plans began, the Office of Indian Education (OIE) has provided technical assistance workshops nationwide to help Title IX grantees effectively implement Title IX projects. Additional workshops have been scheduled for upcoming months. In this section we suggest several approaches for ED to consider as they continue to develop the content and focus of their technical assistance and try to address the most significant issues and problems that affect grantees' ability to develop and implement high-quality Title IX comprehensive plans. The approaches outlined here reflect the suggestions of those whom we interviewed, as well as the conclusions we reached based on our analysis of the data collected throughout the study.

Clarify Concepts, Goals, and Expectations Through Technical Assistance

1. ED program officers and technical assistance providers should host a series of local community meetings and workshops to: (a) explain the goals and objectives of the reauthorized ESEA and the implications for Title IX, Indian parent committees, and Indian education in general; (b) clarify common misunderstandings; and (c) respond to specific questions and concerns that exist among LEA staff and members of the American Indian community.

2. The formula grant application and technical assistance materials should provide clear and consistent definitions of key concepts that help Title IX grantees improve their understanding of comprehensive planning. Concrete models should define and illustrate: coordination, culturally related academic needs, content and performance standards, and program goals and benchmarks. These models should be developed and disseminated as part of the formula grant application and through federally sponsored technical assistance.

3. Assistance provided to LEAs should meet the varying needs of school districts that differ significantly in terms of their enrollment size and the concentration of American Indian students in attendance.

4. Federally sponsored technical assistance providers should provide professional development to practitioners (e.g., teachers, state and district administrators and program coordinators, parents) on integrating culture and language with high standards and the learning of academic skills.

5. Federally sponsored technical assistance providers should provide technical help in assessment and program evaluation by defining a common language for standards-based assessment and by identifying assessment strategies that are consistent with state and local content standards and with local Title IX program goals and benchmarks.

Increase Participation and Linkages Among LEAs, SEAs, and the American Indian Community in Addressing the Needs of American Indian Students

6. Federal program officers and technical assistance providers should consider strategies for broadening the participation of Title IX staff, tribal government representatives, parent committee members, and other members of the American Indian community in the development of Goals 2000 plans, state consolidated plans, local comprehensive plans, and other state and local education reform efforts.

7. ED and SEAs should keep Title IX grantees informed about state and local content and performance standards. Where feasible, states and districts should provide opportunities for Title IX staff and other members of the Indian education community (e.g., representatives from the education departments of tribal governments, American Indian language experts) to be involved in the development of such standards.

8. ED should set challenging but reasonable goals and benchmarks through progress indicators so that all stakeholders--teachers, administrators, monitors, parents, and tribal communities--can use them to assess program and student progress.

I. Background and Program Context

The need for improvements in the academic performance of American Indian students has been well documented. In *Indian Nations at Risk: An Educational Strategy for Action* (1991), this need is described in detail and several recommendations are made for reversing the trend toward low achievement. The report recommends that school officials and educators should, among other things, promote high expectations for all students--including American Indians--and develop an academically challenging curriculum that supports students' learning of American Indian languages and culture. Title IX of the Elementary and Secondary Education Act (ESEA)--which was first enacted in 1972 as the Indian Education Act and amended by the Improving America's Schools Act of 1994--supports these specific recommendations. The law requires local education agencies (LEAs) to (1) help American Indian students improve their academic skills and enhance their knowledge of American Indian culture and language, and (2) support efforts to provide American Indian students the opportunity to achieve challenging content and performance standards. Under the law, LEAs are required to support professional development for staff who work with American Indian students, assess the progress of American Indian students, and evaluate Indian education programs. American Indian parents, communities, and tribal organizations are expected to be full partners in these activities, particularly in planning and program evaluation.

Title IX of ESEA provides formula grants to LEAs to help them develop and implement education programs that "meet the culturally related academic needs" of American Indian students by focusing on the goals and objectives described above. LEAs participating in Title IX generally submit formula grant applications to the Office of Indian Education (OIE) of the U.S. Department of Education (ED) on an annual basis; however, a few grantees apply for multiyear grants. Under the 1994 ESEA amendments, LEAs are required to submit a comprehensive plan, as part of their formula grant application, that describes their strategies for improving educational services for American Indian students and increasing these students' levels of academic achievement. Among the other provisions, the plans must describe how districtwide programs and resources will be woven together and coordinated to meet the educational needs of American Indian students.

In addition, LEAs are required to integrate American Indian education with other titles of ESEA and with Title III of Goals 2000. To reinforce the integration and coordination of all federal programs that support American Indian students, ESEA requires LEAs in states participating in Goals 2000 programs to show how their Goals 2000 plans address the special educational needs of American Indian students and how their plans relate to the goals of their Title IX project.

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Study Purpose

This report presents findings from an evaluation of the comprehensive plans included in the 1995-96 Title IX formula grant applications and from our analysis of interview data collected from educators and other professionals involved in Indian education. The goals of the study were to identify the strengths and weaknesses of these comprehensive plans and to assess the overall quality and feasibility of the strategies developed by LEAs to meet the needs of American Indian students. During the course of the evaluation we also gathered information on (1) the specific challenges and difficulties LEAs confront as they try to develop high-quality, comprehensive plans and (2) the conditions and factors that affected their efforts.

1995 was the first year that grantees were required by law to develop comprehensive plans and, as a result, the timing of this report may have been premature. However, the progress of these comprehensive plans will be analyzed in future years in order to assess the extent to which the initial problems and deficiencies identified in this report are addressed.

The study identifies important policy issues and makes several recommendations for improving planning and programming for American Indian students. In addition to this report, a training guide based on the specific needs identified in the study will be developed for use by technical assistance providers in helping LEAs develop future comprehensive plans.

Study Design

The information presented in this report is based on a detailed review of 138 of the approximately 1,300 1995-96 Title IX formula grant applications submitted by LEAs. (See Exhibit 1 at the end of this report for a complete list of all data sources used in this study.) The sample of applications was drawn from nine states: Alaska, Arizona, California, New York, North Carolina, North Dakota, Oklahoma, Washington, and Wisconsin. Approximately 64 percent of all LEA formula grantees nationwide are located in these nine states. OIE staff identified these states as reflecting the nation in terms of the characteristics of their American Indian population and Title IX projects. Within each state we stratified all Title IX grantees by project size and type of grantee[2]. Within these strata we

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[2] The sample included LEAs with fewer than 100 American Indian students (small), LEAs with 100 to 300 American Indian students (medium), and LEAs with more than 300 American Indian students (large). Bureau of Indian Affairs (BIA)-operated schools and other BIA-funded schools were also included.

selected a random sample of Title IX applications for review. Sample sizes for each state are large enough to permit generalizations to be drawn for the state as a whole. Based on OIE's judgment of the state sample as representative of all states receiving Title IX grants, we have determined that the overall sample of Title IX applications selected for review in this study is representative of all approved Title IX applications nationwide.

The requirements for receiving a formula grant were outlined in the formula grant application packet, and we based our review of the applications and comprehensive plans on these guidelines. Thus, the study assessed the extent to which LEAs' Title IX applications and comprehensive plans addressed eight key issues concerning the content and quality of the educational services and supports available to American Indian students. We measured the extent to which the applications and comprehensive plans:

1. Describe programs and activities for meeting the culturally related academic needs of Indian students

2. Are consistent with and promote the goals set forth in state and local improvement plans (e.g., plans prepared pursuant to Goals 2000, ESEA Title I)

3. Include student academic content standards that are based on challenging state academic standards

4. Include performance goals and benchmarks based on challenging state standards

5. Explain how federal, state, and local programs will be coordinated to meet the needs of American Indian students

6. Describe the professional development that will be provided to prepare teachers and other school professionals to work with American Indian students

7. Describe how the progress of all American Indian students will be assessed

8. Describe how the results of the assessment will be shared with the Indian parent committee and the community served by the LEA and how the findings of previous assessments are being addressed

The study design also called for analyzing Goals 2000 plans. We learned, however, that few states had completed their Goals 2000 planning by the time they submitted their 1995-96 Title IX applications, and even fewer LEAs with Title IX formula grants had written local Goals 2000 plans. Only 21 Goals 2000 plans were available for review from among the 138 LEAs in our sample; we reviewed all of them.

In addition to the document review, we collected information via telephone interviews with: (1) Goals 2000 representatives from each of the nine states included in our sample; (2) the directors of three former Indian Education Technical Assistance Centers (IETACs); (3) four representatives from state and national Indian organizations concerned with education-related issues; and (4) 19 individuals who prepared the 1995-96 Title IX formula grant applications for their LEAs. The latter group was selected following our review of the applications and comprehensive plans. We selected a cross-section of Title IX grantees from public schools and BIA schools. Approximately half had prepared good or fairly good comprehensive plans, while the other half had either failed to develop a comprehensive plan or had only addressed one or two of the required components. Information from these sources was used in the study to: (1) determine the factors that facilitated or obstructed efforts to develop comprehensive plans; (2) identify issues of concern to grantees; and (3) provide explanations for trends observed through the analysis of the Title IX applications and comprehensive plans.

The remainder of this report is organized in three sections: factors impeding the development of comprehensive plans, the content and quality of the Title IX applications and comprehensive plans, and policy implications. The review of Title IX applications and comprehensive plans includes examples of schools and districts that demonstrate promising practices in addressing the federal criteria for comprehensive plans.

II. Factors that Impeded the Development of Comprehensive Plans

This study's findings on the content and quality of the Title IX applications and comprehensive plans are shaped in many respects by the conditions under which the program operates. This context information--which was gathered primarily through the telephone interviews--helps explain, among other things, the extreme variations in the applications and comprehensive plans reviewed as part of this study. These contextual issues centered on: (1) the awareness and understanding of Title IX grantees concerning the requirement to prepare a comprehensive plan; (2) uncertainty around district-level and project-level roles and responsibilities; (3) concern regarding the goals and objectives of the reauthorized ESEA and its implications for Indian education; (4) variations in the timing and scheduling of other relevant programs and activities; and (5) the status of Title IX within many schools and districts.

In general, we found that Title IX grantees need assistance that clarifies the goals and objectives of comprehensive planning and that provides strategies and information for developing and implementing an integrated education program that meets the culturally related academic needs of their American Indian students.

Limited Understanding and Awareness of the Expectations for Comprehensive Plans

Title IX grantees vary significantly in their awareness and understanding of (1) the requirement to prepare a comprehensive plan and (2) the type of information to include in the comprehensive plan. Many LEA representatives interviewed in the study said that, although they had been responsible for completing the Title IX application, they were unfamiliar with the provisions in the 1995-96 Title IX application requiring them to submit a comprehensive plan. In addition, some LEA representatives who were aware of the requirement were confused over the definition and purpose of a comprehensive plan. For example, one LEA representative admitted: "I'm no clearer on the definition of what a comprehensive plan is than I was last August... Does the federal government want our Title I program plan?" Another noted that no one from the state or federal government had shown him how to coordinate plans. "They've told us we must do it, but it's still not clear to me how we are supposed to write it down so it's comprehensible...how the Title I, IX, and regular [education] programs mesh up, and how we can show [that] what we're trying to do is meeting the needs of the children and not overlapping programs...or creating gaps...."

This issue of *what* to include in a comprehensive plan and *how* to present it within the document was also raised by other respondents. For example, one Indian education state representative observed that, because they do not understand the terms, some Title IX grantees have failed to address content and performance standards in their comprehensive plan. She believes focused training is needed to help grantees understand the role of academic standards and the concept of standards-driven reform. Comments from some LEA representatives indicate that they are confused about other issues as well. For example, one LEA representative said that she interpreted the coordination requirement as "an access question." Thus, her response to this particular prompt in the application was to simply state that all students in her district, including American Indian students who qualify, receive federal program services.

The new terminology related to Goals 2000 and the reauthorized ESEA (e.g., local and state Goals 2000 plans, local and state consolidated plans, consolidated applications, comprehensive plans, other state and local plans--including school improvement plans) has resulted in confusion and misunderstandings about the requirements of each. For example, in response to questions about Title IX comprehensive plans, many interviewees began to discuss Goals 2000 or district consolidated plans. Although Title IX is not required to be a part of consolidated planning at the district, state, or federal level, applicants are required to submit a comprehensive plan; clearly the practical distinction between the two is not understood by everyone. Thus, for example, one LEA representative, who had submitted a very brief Title IX application with no comprehensive plan, said that his district had indeed prepared a very detailed consolidated plan that not only explained how the needs of American Indian students would be met but also how Title IX would be integrated into these activities. However, he thought that it was not necessary to include this information from the consolidated plan in the Title IX application.

Confusion over the Roles and Responsibilities of Title IX Project Staff and Other District Staff

It is not clear to many grantees where the responsibility lies for gathering information for the comprehensive plans and writing the final document. Title IX grantees have questions about the role of the district vis a vis the role of the Title IX project in convening planning meetings, developing plans, coordinating implementation, and reporting on the required activities in the comprehensive plans. Some of the questions are motivated by concern that Title IX staff will be expected to use their limited resources to complete new, mandated tasks and requirements. Questions for which clear direction and guidance are lacking include:

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Whose responsibility is it (i.e., Title IX staff, other district staff) to design and implement a comprehensive plan that addresses all of the required issues?

Are Title IX project staff responsible for describing only the ***district's*** plan to address the issues raised and then showing how Title IX project activities relate to or support the district's plan? If so, what should Title IX project staff do if their district has failed to develop a comprehensive plan?

Are Title IX project staff responsible for developing and defining the comprehensive plans and articulating their individual project goals and activities through the comprehensive plan framework? For example, because professional development that trains school staff to work with American Indian students is required as part of the comprehensive plan, are local Title IX project staff required to provide this service out of the project's own budget--especially if the district has no plans to do so?

Because many Title IX projects sponsor activities that concentrate on cultural activities that are not generally included in state content and performance standards, are they responsible for students' attainment in academic areas that are taught in the regular classroom or in other education programs?

Resistance to Coordination and Integration with Other Categorical Programs

According to the directors of the former IETACs and others with whom we spoke, some members of the American Indian education community are confused and somewhat concerned about the goals and intent of the reauthorized ESEA and, in particular, its emphasis on comprehensive planning, the coordination and integration of education programs and services, and the expectation that Title IX should address state academic standards. They believe that this new focus is not consistent with the goals and intent of the original Indian Education Act of 1972.

The main concerns are that (1) coordination may lead to Title IX funds being diverted to non-Indian students, leaving fewer resources available for American Indian students and (2) American Indian students' cultural needs may be overlooked if program lines are blurred through integration and coordination. For example, our review of Title IX applications and comprehensive plans revealed that grantees may be experiencing some difficulty in reconciling the language of the original Indian Education Act of 1972 with the reauthorized ESEA. Some grantees appear to interpret the "supplement not supplant" language in the Indian Education Act of 1972 to mean that the Title IX program should remain separate from other programs. A recurring, boiler-plate phrase in many applications is: "Title IX services will only be used for programs we cannot provide to Indian students through our regular programs [e.g., Title I]. The Title IX program will supplement and not supplant existing programs or services in the school." In short, grantees may fail to see how they can successfully coordinate and

integrate Title IX with other programs without violating the "supplement not supplant" requirement that was explicit in the language of the original Indian Education Act of 1972.

Some of the basic assumptions behind the new laws have not been unanimously accepted. For example, some do not agree that Title IX should emphasize the achievement of state academic standards. In the view of one respondent, "standards are down the road; reinforcing students' cultural identity is far more important in the short term." An Indian education director in a state agency added that Title IX's role is not to help students meet state standards; "the state is responsible for that." In his view, Title IX should concentrate its limited resources on linguistic and cultural activities. Another interviewee from an LEA in our sample pointed out that, because American Indian students are performing at a very low academic level, "our goal is to achieve improvements, not state standards."

Professional development was another issue that also raised some concerns. The law requires LEAs to provide professional development opportunities for teachers to prepare them to work with American Indian students. One local federal programs coordinator pointed out that, in most districts, resources for providing professional development are scarce, and these limited resources should not be targeted towards meeting the needs of American Indian students--a very small minority group. According to this respondent, "It is unrealistic to expect that with the volume of competing demands [e.g., the need to bring teachers up to speed in various reform areas such as portfolio assessment] professional development will focus on Indian students."

The director of a national Indian organization stated that he and others have interpreted the comprehensive planning requirement as a call to "pool money for programs." He believes this will "detract from the intent of the [original] Indian Education Act, which [was] to raise cultural awareness for Indian students so as to increase learning." In his view, because achievement levels are so low, the programs need to remain separate and distinct so that they do not get lost in a larger comprehensive plan. Besides the problem of the programs becoming potentially lost, there is the fear that the resources available for Indian students will be diminished if Title IX funds are used for all students in the name of collaboration rather than for American Indian students specifically. "If this happens, Title IX will die."

Timing Variations Affecting Goals 2000, Consolidated Planning, and Standards Development

The timetable for Goals 2000 plans and consolidated planning activities at both the state and local levels varied among states and differed from the timetable for preparing the 1995-96 Title IX application and comprehensive plan. This was problematic for grantees attempting to address some of the components of their comprehensive plans without knowing the content of these other documents. For example, according to a report from the Council of Chief State School Officers (CCSSO, 1995), only four of the nine states in our sample (Arizona, North Carolina, North Dakota, and Oklahoma) had established state standards when the 1995-96 Title IX applications were submitted. Therefore, it would have been impossible for Title IX grantees from other states to include a discussion of project goals regarding state standards in their application. In addition, because many districts had not yet completed district consolidated planning activities, Title IX grantees could not provide detailed information about districtwide program goals, plans, and activities. In fact, some Title IX grantees may have simply disregarded questions on the application that they believed did not apply to their situation. For example, one LEA representative said that he was surprised that the Title IX application required him to address Goals 2000 and state standards in the comprehensive plan because it was his understanding that these issues were "dead in the water" in his state.

Isolation of Title IX Staff and Projects within Many Districts and States

Title IX staff are sometimes excluded from--or when invited, do not participate in--state and district planning activities, and the Title IX program is often isolated and disconnected from other federal and local educational programs and activities within school districts. For example, one state education agency (SEA) representative informed us that her state had sponsored a three-day Goals 2000 conference for federal program directors in school districts around the state. Title IX representatives were not invited because, she said: "They are not required to be a part of Goals 2000." Another SEA representative who has been working with LEAs to develop consolidated plans noted that Title IX program representatives have not participated in this planning, although they have been invited. She believes their reluctance is a result of confusion over what the legal changes will mean for their program.

Under the reauthorized ESEA, state governments have been assigned a major leadership role and are exercising their responsibility to ensure that the goals of the new law are achieved. By law, however, it is the federal government that deals directly with LEAs on Title IX-related issues. Thus,

the state Indian education directors who were interviewed indicated that they had little or no idea what was happening in local Title IX projects. Several expressed concern that, although the states are taking the lead in consolidated planning that involves most of the other federal education programs, Title IX is not "at the table" with other programs. Because federal Title IX money flows directly to LEAs, there is no mechanism in place to ensure coordination between Title IX and other federal programs administered by SEAs. As one interviewee noted, "This fundamental problem has never been addressed."

As a group, these issues and concerns apparently impeded, to varying degrees, the development of the 1995-96 Title IX comprehensive plan documents and the implementation of the activities these documents were to have described. As a result, the content and quality of the information provided within applications and comprehensive plans--which will be discussed in the following section--varied considerably.

III. Title IX Applications and Comprehensive Plans: Vague and Incomplete

The 1995-96 Title IX application required grantees to address several important issues within the context of a comprehensive plan. The expectation was that, in addressing these issues, LEAs would promote high academic achievement among American Indian students. To summarize, the application required LEAs to:

- Identify challenging performance goals that are based on high standards and hold all students--including American Indian students--to these standards
- Strengthen coordination and integration among educational programs
- Improve teaching and learning by adopting a systematic and organized approach to professional development
- Create partnerships among schools, parents, and communities to support students' academic endeavors and to meet their varied needs
- Demonstrate how the different parts of the school system coordinate and direct programs and resources towards meeting the needs--in particular, the culturally related academic needs--of American Indian students and realize the goal of enhanced student achievement

This section of the report summarizes how the applications and plans in our sample addressed the required components. The information is organized around the eight elements outlined in the statement of work. In addition, we profile seven Title IX grantees--five public school districts and two Bureau of Indian Affairs (BIA) schools--that provided good descriptions of how they plan to address one or more of these issues.[3]

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[3] The schools and districts profiled at the end of each sub-section have not necessarily addressed all components of the comprehensive plan adequately. They were selected because they capably addressed one or more issue areas (e.g., coordination, professional development).

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Summary Features and Characteristics of LEAs' Comprehensive Plans

Almost half of all Title IX applications that we reviewed failed to mention a comprehensive plan.[4] (See Exhibit 2 at the end of this report.) Although slightly more than half referred to a comprehensive plan, significant variation was found within this group with regard to the detail and quality of the information provided. For example, some stated that their comprehensive plan is currently being developed; others previewed what is likely to be included in this document. Other grantees suggested that they had conducted comprehensive planning, but our analysis revealed that few, if any, of the required issues were addressed substantively. While some provided details on several components of their comprehensive plan, few addressed all of the required issues adequately.

More than half of all the applications and comprehensive plans did not refer to: (1) content and performance standards; (2) coordination among federal, state, and local programs; and (3) their plans to assess the performance of all American Indian students (i.e., not just those being served directly by Title IX). About half did not refer to the relationship between the goals of Indian education and those of other state and local plans, or to professional development. Almost half made no mention of their plans to share student assessment results with the community.

The enrollment size of a district appears to have had some bearing on the content of the comprehensive plans; however, the difference between large and small LEAs was not significant in several key areas. Our analysis revealed that small districts (fewer than 100 American Indian students) were less likely to refer to (1) the relationship between the goals of their comprehensive plan and those of other state or local programs; (2) the identification of performance goals and benchmarks; (3) plans for professional development; and (4) plans to assess the performance of all American Indian students, in comparison with large districts (more than 300 American Indian students). On the other hand, there was no difference between small and large districts in terms of their likelihood to refer to (1) a comprehensive plan; (2) content standards; (3) coordination; (4) assessment of participants in the Title IX program; and (5) plans for sharing performance results with parents and the community.

Although most Title IX projects address more than one area of student need, the majority identify improving academics as a primary goal. Eighty-eight percent of the applications in the study

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[4] Although the term "comprehensive plan" may not have appeared in an application, in a few instances, a grantee may have discussed one of the required components of the comprehensive plan (e.g., professional development) somewhere else in their application--typically, in their project narrative. Thus, even though an application did not include a section entitled "comprehensive plan," it may still have satisfied one or two of the plan requirements.

sample identified improving academics as a primary goal (Exhibit 3). A smaller percentage (62 percent) included cultural enrichment among their program goals. One-third or so also focus on dropout prevention, counseling, and/or parent involvement.

1. Meeting the culturally related academic needs of Indian students

The Title IX applications and comprehensive plans tend to describe cultural enrichment and academics as separate project activities, and, with few exceptions, are vague on how the grantees would meet the requirement to address the "culturally related academic needs" of Indian students. Activities are listed with little detail or specific examples of what these activities entailed. Most grantees separate cultural and academic needs and describe distinct activities to meet those needs. Grantees do not describe cultural activities in terms of developing academic skills and integrating American Indian culture and language with high standards and student performance and content goals.

This vagueness could result from the fact that the term "culturally related academic needs" is not formally defined in the legislation or in ED program materials. Instead, grantees are encouraged to work with their local parent committees to develop their own definition and criteria and to design a program that satisfies the local needs they identify. However, few grantees appear to be aware of strategies that integrate culturally relevant curricula and instructional strategies into a school's core academic program, or of the benefits that American Indian students may derive from such an instructional approach.

The academic-related activities that are described typically include academic tutoring, dropout prevention, counseling (career, social, health), monitoring and providing academic support for absentees, purchasing materials and equipment, and enhancing parent involvement. Very few grantees describe tutoring programs that use cultural materials and topics to teach academic subjects and develop basic skills. Tutoring programs either involve pull-out or after-school sessions or in-classroom assistance from teacher's aides. On the whole, cultural activities are described as extracurricular/enrichment events that occur after school, during the summer, or as activities apart from the regular school program. Events include field trips, culture and language classes, pow-wows, arts and crafts activities, and community and tribal speakers.

Grantees separate culture and academics for various reasons. As noted above, the term "culturally related academic needs" is not defined, and most grantees appear to perceive culture and academics as separate domains. In addition, the Title IX application is unclear about whether grantees

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are required to integrate Title IX with the regular school program. Another explanation is that local Goals 2000 plans, districtwide initiatives, and school improvement plans may not emphasize a need to integrate culture and native languages with academic standards and student academic learning. Furthermore, little training or modeling is available to explain how the concept can be practically implemented. Thus, the integration of these spheres--within a project or between a project and the rest of the school program--may not be an immediate project objective. In fact, the integration of academics and culture may not be universally accepted as a worthwhile goal. For example, several interviewees emphasized that some members of the American Indian community see legitimate benefits in offering separate cultural activities to Indian students and think it important to separate culture and academics. They believe that providing students with separate activities, such as culture clubs, history and language courses, and leadership training, may strengthen group identity and intensify student learning of native culture.

BIA schools appear more likely than public schools to connect cultural activities to academic development and to integrate culture into the core curriculum program. Regular public schools are more likely to treat cultural activities as separate and distinct from academics. One possible explanation is that, because BIA schools, unlike regular public schools, are typically all- or majority-Indian, grantees find it easier to integrate and coordinate with other school programs and activities without the fear of violating requirements that Title IX money be used to meet the needs of American Indian students. No matter how BIA schools decide to spend Title IX money, American Indian students will be the main beneficiaries. A second possibility is that, most--if not all--BIA schools had developed consolidated plans before the due date of the 1995-96 Title IX application. In contrast, our conversations with state representatives revealed that, for the most part, LEAs in the states in our sample were not required to submit consolidated plans until the following year (i.e., 1996-97). So, whereas staff within BIA schools had already participated in several BIA-sponsored workshops and training sessions to help them become familiar with the concepts of consolidated planning, coordination, and integration, many public school districts had not yet begun consolidated planning activities when the 1995-96 Title IX applications were prepared.

Lukachukai Boarding School in Arizona is a good example of how some educators have developed strategies that facilitate the use of cultural experiences to develop academic skills.

Lukachukai Boarding School, Arizona

Lukachukai Boarding School is a K-8, BIA-operated school that serves approximately 420 students, all of whom are American Indian. Its Title IX budget for 1995-96 was $56,277. Project goals include academic and cultural enrichment, parent involvement, and self-esteem building.

The Title IX project is designed to improve students' language arts and reading skills through a dramatic arts and multicultural education program. The Title IX application states that a teacher with training in drama and multicultural education will be in charge of developing and implementing instructional activities. She will be assisted by an education specialist whose position is jointly funded by Title I, Title II, and Title IX. The teacher and education specialist will use traditional culture and drama selections as a vehicle for developing students' reading, verbal, analytical, conceptual, and social skills. The skills that are taught will be aligned with both the Navajo Nation curriculum and standards and the Arizona Dramatic Arts Curriculum guide. Title IX staff will train regular classroom teachers in strategies for incorporating dramatic arts and culture into language arts and reading instruction. In addition, the Title IX staff will model this instructional strategy by making presentations in individual classrooms throughout the academic year.

2. Providing professional development for teachers and other school staff

The applications we reviewed provide only a vague description of professional development opportunities. Information on which staff will receive training, who will serve as trainers, and the specific content and duration of training tends not to be presented. In fact, only about half of the applications in the study sample refer to professional development. Among those that did, few include more than a sentence or two of information.

Despite the apparent lack of attention to this issue, our telephone interviews with members of the American Indian education community suggested that there is widespread agreement on the serious need for professional development targeted to teachers, other school staff, parents, and community members who work and live with American Indian students. To address this need, some states (e.g. New York, North Dakota) have initiated steps to develop culturally relevant curriculum and to train school staff on how to use it. As one SEA representative noted, "Many teachers simply lack basic knowledge about Indians." In addition, although few school personnel speak a native language, according to the experts, professional development and training in this area were rarely mentioned in the applications and are presumably not widely available.

Although Title IX project staff are typically quite knowledgeable about American Indian culture and in some cases, language, many Title IX staff (especially, tutors, home school coordinators, teacher aides) lack a college degree and formal teaching credentials. Several interviewees observed that LEAs

need to provide more avenues for these staff to earn professional credentials. For example, one state Indian education director pointed out that career ladders that enable individuals to earn college degrees while working would not only make them more effective in the classroom, but would also enhance their position and credibility within the school system while increasing their ability to influence positive change for American Indian students. They would thus become equal partners with other professionals in the schools. "Once you view Indian people as partners, you will value their culture, language, and beliefs," he stated.

At present, the professional development directed at the non-Indian school staff tends to focus on enhancing cultural sensitivity or awareness of American Indian customs and culture. For example, several applications stated that members of the local Indian community (e.g., tribal elders, parents) are invited to orient new teachers and provide them with cultural awareness training. Others noted that Title IX staff share their knowledge of local American Indian customs and history with non-Indian school staff and suggest instructional methods and other classroom strategies that are likely to be effective with American Indian students. Professional development for Title IX staff--who are typically American Indian--tends to focus more on instructional techniques and project management strategies. Several districts also invite parents to participate in staff training so that they can assist their children with their schoolwork at home.

Most of the applications describe single, "one-shot" professional development events, and the connection to Title IX project goals and objectives is not always clear. For example, one application states that one of the sessions that would be available during the district's in-service day would focus on "working with Indian youth" followed by a tour of the nearby reservation. Another states that the district's staff development committee will "plan at least one workshop to increase staff preparedness to work with American Indian students." In some LEAs, even though workshops related to the teaching of American Indian students are offered, attendance is optional. Thus, the actual number of staff members who receive training is unclear.

The following profile highlights a district where professional development is viewed not as a single, isolated event but as a key ingredient for success that includes all or most staff members and that occurs on an ongoing basis.

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Greasewood Boarding School, Arizona

Greasewood Boarding School is a BIA-operated school that serves 386 students, all of whom are American Indian. Sixty percent of the enrolled students reside at the school. The Title IX budget for 1995-96 was $49,041. Project goals include dropout prevention and increasing parent involvement.

The school is implementing the Effective Schools model and has as a major goal the improvement of staff effectiveness through staff development. According to their application, "Greasewood School's instructional staff will have access to programs for the continued improvement of their professional skills and the opportunity to acquire the knowledge and skills needed to instruct and prepare Greasewood's students for the next century." Staff development focuses on the Effective Schools process, effective instruction, cooperative learning techniques, technology, language arts, English as a Second Language (ESL), inclusion models, and higher order thinking skills. On-site college courses are offered for teacher assistants participating in teacher certification programs and for teachers working toward ESL/Bilingual endorsements.

3. Developing shared goals with other state or local improvement plans

We found limited information on the consistency between Title IX and other state or local plans. In many applications, there is no discussion of state and local improvement plans and no mention of how the Title IX comprehensive plan may be consistent with the goals stated in those documents. When addressing consistency across plans, grantees typically state that consistency exists but provide no details or specifics about how the plans are linked. Timing appears to be a factor in this area, however. For example, several applications indicate that, once the district completes its local improvement plan, the Title IX comprehensive plan will be revised to ensure consistency with district goals. Other applications state that a district committee has been formed to develop the local improvement plan and that a representative from the Title IX project will serve on the committee to help ensure that American Indian students' needs are addressed at the district level and that the comprehensive plan is consistent with local improvement goals.

The following profile highlights a district that diagrammed how the goals of other education programs and Title IX are related and provided examples of ways in which Title IX supports other district efforts.

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Heavener Public School District, Oklahoma

Heavener Public School District serves 983 students, 587 of whom are American Indian. The Title IX budget for 1995-96 was $70,325. Project goals include enhancing students' performance on Oklahoma's state standards test--the Performance on Priority Academic Student Skills (PASS), increasing students' knowledge of American Indian culture, enhancing students' self-esteem, and reducing the dropout rate.

According to the Title IX application, each of these goals is shared and addressed by other federal education programs within the district. For example: (1) Title I supports the academic goals by providing professional development for teachers and teacher assistants that focuses on higher order thinking skills and specific PASS objectives; (2) Title II also supports the academic goals by providing training for teachers on how to integrate mathematics and science into instruction for other subject areas; (3) Johnson O'Malley funding supports the cultural education goal by sponsoring field trips to American Indian historical sites and cultural events; and (4) Drug-free Schools funding promotes the development of self-esteem by supporting the activities of the Students Opposing Drugs and Alcohol Club, by paying the costs associated with bringing guest speakers to the school, and by providing instructional supplies for drug-prevention education.

Similarly, several local, state, and national goals are addressed by the Title IX program. For example, Title IX's emphasis on PASS skills is in keeping with Goals 2000's emphasis on students demonstrating "competency over challenging subject matter." The Title IX project also seeks to increase students' knowledge of American Indian culture. This initiative supports Goal 2 (i.e., "Maintain Native Language and Cultures") of the National Education Goals for American Indian and Alaska Natives. Finally, improving students' self-esteem and students' performance on the PASS are key components of the district's four-year school improvement plan.

4. Establishing goals for American Indian students that are consistent with state and local content standards for all students

Among the Title IX applications reviewed, more than three quarters did not include state or local content standards. Telephone interviews indicated that content and performance standards may not have been addressed in the applications for several reasons. First, Title IX project staff may not have been aware of local or state content and performance standards. As noted earlier, several states and localities had not developed Goals 2000 plans and state content and performance standards at the time they prepared their Title IX applications. Second, grantees may not have understood how to apply the language of academic content standards in the context of their Title IX project--especially if their project goals and activities are not specifically academic. For example, if a project's activities include storytelling by elders or career education-related field trips and guest speakers, the connection to state content standards in core academic areas may seem tenuous at best. As one LEA representative pointed out, "Culture and context must be taken into account in standards development." Third, Title IX staff and parents have not been informed about how culture and academics can be connected to high standards and student performance and content goals; there is little understanding of how culture can be

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integrated into the regular school curriculum to develop academic skills and at the same time enhance cultural pride and knowledge among American Indian students.

The varied understandings of the concepts underlying "content and performance standards" were evident in our interviews and no doubt contributed to the weak connections between Title IX projects and states' content and performance standards. For example, a local superintendent in one state that had developed and disseminated its standards widely showed his own confusion about the intent for content standards to be rigorous. He stated, "We do have [standards] but usually that kind of thing slows you down and makes you meet a minimum requirement. We like to challenge our students and not set a minimum requirement." Another LEA representative was convinced that "American Indian students are so far behind right now that we are concentrating on remediation." A third interviewee who referred to meeting content standards in her application explained that she was using the concept generically: "I was just talking about content standards as those standards you teach in whatever subject matter you're working on.... Each project is different and the standards for the project area you're working with will be different."

In general, applicants tied Title IX project objectives to specific project activities rather than to content and performance standards. These objectives tend to be described as behavioral or skills-oriented. For example, objectives are often based on student participation and completion rates in project activities and on school attendance and achievement on tests.

The following example profiles a district where the tutoring provided through Title IX is geared toward developing skills that the district and state agree are essential for all students to master.

Holbrook Unified School District, Arizona

Holbrook Unified is a public school district that serves 1,983 students, 1,100 of whom are American Indian. The Title IX budget for 1995-96 was $133,195. Project goals include improving academics, increasing attendance, and providing native language and cultural enrichment.

According to the Title IX application, the academic component of the Title IX project is closely linked to the state's content standards. The project director explained that she keeps "a copy of the [Arizona] Essential Skills document on my desk to refer to it when I need it." The school district's academic goals guide the development of the Title IX project, and Title IX students have the opportunity to develop the competency skills that are required in grades 4, 8, 10, and 12.

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5. Coordinating Title IX with other federal, state, and local programs

Although our review of applications indicates that Title IX projects may be coordinating with a variety of federal, state, and local programs (e.g., Title I, Johnson-O'Malley, special education, gifted and talented) in some districts, we found few, if any, details describing *how* collaboration is occurring.

Although some Title IX projects are located in Title I schoolwide sites and will be connected to the schoolwide plan, details and examples were generally not presented to describe how Title IX fits into the Title I schoolwide initiative. Similarly, although some applications note that Title IX personnel are members of schoolwide committees, no descriptions are offered on how their roles and responsibilities will be linked to schoolwide programs and objectives. In a few applications, there were descriptions of plans to involve Title IX representatives in district level committees charged with developing future improvement plans; however, there is little to suggest that current Title IX involvement is extensive. Those applications that do address coordination tend to describe low-level collaboration, such as tutors working with teachers to identify at-risk students and Title IX staff interacting with other federal program staff to identify eligible students for particular programs. A few applications describe the commingling of funds across programs to jointly fund staff positions or materials. No further details on coordination are typically provided.

The scarcity of information on this issue in the Title IX application appears to result from (1) limited local understanding of the motives and methods for coordination and (2) doubts about the potential effectiveness of this strategy for improving services to American Indian students. The interviewees reported that there was confusion within some districts surrounding the objectives of a comprehensive approach, particularly because Title IX has traditionally been viewed as a separate entity with little or no connection to the regular school program. Historically, Title IX has operated as an isolated program within districts and states, with no mandate to coordinate with other federal programs. Although federal policy now emphasizes coordination among programs, the mechanism by which this is to occur remains unclear to LEAs, and some are unsure about what comprehensive planning entails and how program coordination will affect Title IX activities. To develop a comprehensive approach, interviewees said they need a clearer understanding of the goals of coordination. In addition, they need concrete models that illustrate: (1) what coordination would look like in practice and (2) the federal vision and expectations in this area (e.g., information on districts that have successfully coordinated their federal education programs).

In the absence of a working model to help define what a comprehensive plan and coordination may look like in schools, district staff find it difficult to understand how Title IX will fit into the larger

picture and how American Indian students will benefit from coordination. For example, one interviewee--a Title IX director--informed us that he intended to take a member of the Title IX parent committee with him to a Title I planning meeting, but he had no plans to increase the coordination beyond that. The director's concern was that Title IX funds would end up "subsidizing" Title I: "It's up to me and the parents to decide if we want to subsidize Title I with Indian education money..." Some LEA representatives with whom we spoke indicated that they too were cautious about coordinating with other programs because they believed that members of their Indian parent committee might object out of concern that coordination would result in diminished services for American Indian students. Several emphasized that parental authority in Indian education must be acknowledged and respected. As one Title IX director noted, even though he uses the results of needs assessments to direct the Title IX project, "the parent committee will change the direction, amend the direction, or approve the direction. Most likely they will make amendments... They are extremely active...nothing gets past them..."

Several interviewees raised the concern that they and/or other members of the American Indian community are fearful that coordination may not necessarily have a positive effect on American Indian students. Specifically, the concerns are that: (1) coordination will weaken the Title IX focus on American Indian students--and eventually lead to program dissolution; (2) coordination will diffuse the strength of Title IX, and the benefits of a separate program (i.e., the maintenance of a strong focus on American Indian students and their specific needs) will be lost; and (3) coordination is synonymous with reduced program funds and reduced support for meeting American Indian students' needs. Even interviewees who acknowledged that coordination is important and that it would help reduce duplication of program services warn that coordination should not diminish American Indian students' access to cultural education and to other services that meet their unique needs. As one individual suggested, the program should be coordinated but separate.

The two profiles that follow illustrate how good program coordination can occur. The first presents a school that explains how each program--including Title IX--will focus on specific areas that together form a system capable of addressing the major student needs. The second profile highlights a district where the emphasis is placed on coordinating the efforts of Title I and Title IX to ensure that American Indian students receive the help they need.

Greasewood Boarding School, Arizona

Greasewood Boarding School is a BIA-operated school that serves 386 students, all of whom are American Indian. Sixty percent of the enrolled students reside at the school. The Title IX budget for 1995-96 was $49,041. Project goals include dropout prevention and increasing parent involvement.

According to the Title IX application, Greasewood's comprehensive schoolwide program will promote high levels of academic achievement and "promote the collaboration and cooperation of all programs under the guidance of a site-based leadership team." The leadership team includes: program coordinators from Title IX, Title I, and Title II; members of the instructional and administrative staff; parents; and outside consultants. The team is responsible for overall coordination of the comprehensive program and school improvement activities. The team: conducts needs assessments; plans and implements programs; manages budgets; evaluates and revises programs; conducts and participates in staff training; develops and implements new instructional units and curriculum; and keeps all school staff and community members apprised of school plans, activities, and evaluation results.

Under the comprehensive plan, all student needs will be met through the coordinated effort of the following programs:

Effective Schools	Will provide training and support for the comprehensive plan through conferences, models for improvement, and task teams to address the various components of the plan
Title IX	Will provide a home liaison to support family education and involvement activities; will focus on improving attendance and school retention
Title I	Will provide staff development and help finance curriculum development efforts, reading teachers, teacher aides, an ESL specialist, instructional materials, a resource center, and a family involvement program
Title II	Will support intensive, long-term professional development for an integrated approach to math and science instruction, curriculum development, and technology
Title IV	Will support drug and violence prevention activities in partnership with social services agencies
Gifted and Talented	Will provide a teacher to support students with special abilities and will provide activities to ensure that students master the state content standards
Goals 2000	Will provide the goals framework and will support program planning and implementation

Richmond County Schools, North Carolina

Richmond County Schools is a public school district that serves 8,695 students, 300 of whom are American Indian. The Title IX budget for 1995-96 was $37,652. Project goals include dropout prevention, self-esteem building, and cultural enrichment.

The Richmond County Schools' Comprehensive Plan states that Title I and Title IX coordinators will work together to meet American Indian students' needs. Both programs are housed within the district's Federal Programs Office. The project coordinators will gather and review achievement data on American Indian students. In addition, K-12 remediation counselors and school health nurses will meet frequently with Title I and Title IX coordinators to discuss American Indian students' needs and to review project findings. The goal of these meetings is to maintain an "open chain of communication" between project staffs as they work to coordinate their efforts to meet American Indian students' academic, social, and health-related needs.

6. Identifying performance goals and benchmarks for attaining state content and performance standards

Developing goals and objectives that are related to project activities has always been a requirement in the Title IX application. However, even though the majority of the applications we reviewed referenced performance goals and benchmarks--over three-quarters included performance goals and over two-thirds addressed benchmarks--none were connected to either state content or performance standards. For the most part, Title IX performance goals and benchmarks address only project-level, student-focused goals that are behavioral or skills based--and often unchallenging. The applications do not address the new requirement to connect goals and benchmarks to ambitious state standards.

Examples of stated goals and benchmarks from various Title IX projects include the following:

Goal: Through individualized tutoring assistance, to help students improve in subjects in which they have failed

Benchmark: By the end of the school year, 90 percent of the students receiving 25-35 hours of tutoring will pass the required subjects that they formerly had failed.

Goal: To increase students' proficiency in higher math

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Benchmark: By the end of the year, 90 percent of the students enrolled in the advanced math lab will earn a passing grade in this lab and in the advanced math class in which they are enrolled.

Goal: To increase Indian students' appreciation of Native American art

Benchmark: By the end of the school year, 80 percent of students enrolled in the arts class will have received instruction in a Southwestern, culturally based, advanced art program, and each student will produce his or her own art work.

Goal: To increase awareness of career information and exploration

Benchmark: Students in grades 8 through 12 will participate in at least two activities focusing on career exploration and document their career planning by maintaining a personal file. Ninety percent of American Indian students in grades 8 through 12 will have folders on file in the guidance offices containing a plan of study, career interest areas, and assessment information.

The goals and benchmarks that are set are often based on participants' performance on standardized tests. In some instances, however, the goals that are set reflect either very low, or overly ambitious, expectations for students. For example:

- Indian students will increase their reading level, as measured on the Iowa Test of Basic Skills, by an average of 1 percentile.
- Students will gain an average of 3 percentage points on the achievement test administered the following spring.
- After completing the school year, American Indian students will improve their test scores on the ITBS by 1 NCE.
- After completing eight weekly one-hour sessions, the participating Indian students (under tutelage) will have increased their skill in reading, math, and language by 4 NCEs, as measured by the ITBS and satisfactory performance on criterion referenced tests (75 percent mastery).

7. Assessing American Indian students' performance

Although almost every application we reviewed described how the progress of Title IX participants would be assessed, fewer than half indicated whether they intend to assess the progress of all American Indian students in their district, as is required. One possible explanation for this pattern is

that some Title IX staff focus on project participants and regard non-participants as beyond their responsibility. For example, one local federal programs coordinator whom we interviewed said that she did not understand why she was being asked to assess the performance of all American Indian students. She asked, "How can we be held accountable for Indian students who are not involved in our program?"

Title IX projects rely primarily on student grades, attendance records, standardized test scores, pre/post test scores, teacher logs, and, to a lesser extent, student or parent surveys to determine student progress. In nearly all of the applications in our sample, assessment focused on academic-related outcomes and on the use of standardized tests, in combination with classroom performance, as evidence of student and program performance. Although several of our interviewees from SEAs and national Indian education organizations suggested that Indian education programs should include indicators that assess performance in a variety of other areas (e.g., knowledge of tribal culture, language, and history; gifted and talented and special education placements; leadership skills; entry into postsecondary institutions), the Title IX applications in our sample suggest that indicators such as these are not being monitored by project staff.

In addition to describing their plans for assessing student achievement, some applications also include information on how the results of the student assessment have been, or will be, used. Typically, these applications indicated that: (1) assessment helps to identify areas of student weakness and to guide teachers in planning future instruction; (2) the assessment process helps to determine whether American Indian students are attaining state content and performance standards; and (3) the assessment process is a tool for project management that can help identify obstacles and solutions related to the organization and operation of the project.

In general, there is little coordination in the project applications among the sections that address content and performance standards, performance goals and benchmarks for attaining goals, and methods of assessing American Indian students' performance. Ensuring coordination among these components, however, is essential to a workable comprehensive plan where student achievement is geared to district and state content standards and where the goals of the Title IX project are routinely monitored. Currently, many states are using assessment instruments that have not yet been aligned with their content and performance standards. However, once aligned state assessments are in place, they will be informative resources for monitoring both student and program performance. If the local Title IX project uses the same student assessments as the district uses, and if that assessment program is aligned to state and district content and performance standards, the assessment information can be used to monitor both student achievement and program effects.

The following profile highlights a district where the Title IX project's assessment tools are the same as the district's. As the district initiates its new standards-based assessments, the Indian education program plans to use the information it receives to report to parents and to guide program planning for students. This coordination between Title IX and the districtwide programs ensures that all American Indian students will be assessed and will be held to the same high standard as all other students. Furthermore, Title IX will be assessed on the same standard as other specialized education programs in the district.

San Diego Unified School District, California

San Diego Unified is a public school district that serves approximately 127,000 students, 350 of whom are American Indian. The Title IX budget for 1995-96 was $45,731. Project goals include academic tutoring, enhancing cultural awareness, and career counseling.

According to the application, the assessment component of the Title IX project is based on San Diego's assessment program that has been established for all students in the district. The school district periodically assesses all American Indian students--including those who do not participate in Title IX-funded activities--and reports their test results to the Indian parent committee via the School Accountability Report Card. Each year, Title IX staff and parents analyze these assessment results to determine the focus of the following year's tutoring efforts. Although students are currently assessed using the Abbreviated Stanford Achievement Test (ASAT), the district is developing a new standards-based assessment program that will be more appropriate in a district "that is moving toward becoming standards-driven and standards-based."

8. Communicating performance results to parents and the community

Almost half of the Title IX applications in our sample did not discuss a strategy for communicating students' performance results to parents or the community. Most provided brief, general information on dissemination strategies that were similar among projects. These methods include sharing regular (quarterly, monthly) project evaluations and performance results through some of the following events: parent committee meetings, public hearings, school board meetings, tribal leadership or governance boards, parent workshops, school open-houses, and parent-teacher conferences. Others disseminate information via newsletters or other documents. For example, one application described how the Title IX project publishes a newsletter that is sent to all families, district principals, and central administrative staff. The newsletter includes original literary and art work produced by students enrolled in Title IX and lists of student accomplishments in academics, sports, extracurricular activities, and community service.

As the following profile illustrates, several grantees also reported that some individuals serving on the parent committee were involved in developing and implementing the project evaluation, and shared responsibility for disseminating results to other parents and the wider community.

Kings Canyon Unified School District, California

Kings Canyon Unified School District is a public school district that serves 8,390 students, 85 of whom are American Indian. The Title IX budget for 1995-996 was $37,652. Project goals include improving reading and math skills and increasing knowledge of tribal histories and cultures.

According to the Title IX application, the district places a high priority on involving the parents of American Indian students in project and school activities. For example, with the help of a counselor from the local Indian health center and the Indian education liaison, parents visit their children's classrooms and learn strategies for helping their children develop academic skills. In addition, Title IX relies on parent volunteers to work with school staff in providing tutoring and in organizing activities for the American Indian Culture Day. One of their most important responsibilities, however, is program evaluation. Project activities are monitored and evaluated by the parent committee at regular monthly meetings that also include ongoing needs assessments. Summary reports are prepared at the end of each semester, and recommendations for program changes are made at these times.

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IV. Approaches for Improving Title IX Comprehensive Plans

Since this review of LEA comprehensive plans began, OIE has provided technical assistance workshops nationwide to help Title IX grantees effectively implement Title IX projects. These workshops included information on the purpose of IASA and its impact on Indian Education programs, the purpose of the formula grant program, parent involvement, and Title IX legislative changes. In addition, OIE provided assistance with comprehensive needs assessment, development and components of the comprehensive plans, program design, and other program/application requirements. The workshops also focused on the funding process, application forms, financial management, and new site visit procedures.

Additional technical assistance workshops have been scheduled for upcoming months. This section suggests several approaches for ED to consider as they continue to develop the content and focus of their technical assistance and try to address the most significant issues and problems that affect grantees' ability to develop and implement improved Title IX comprehensive plans. The approaches outlined here reflect the suggestions of those whom we interviewed, as well as the conclusions reached based on our analysis of the data collected throughout the study.
Specifically, we address the need for ED to (1) clarify and explain underlying concepts, goals, and expectations related to comprehensive planning and (2) develop and communicate strategies for initiating and maintaining a comprehensive plan that involves members of the American Indian community and addresses the needs of American Indian students.

Clarify Concepts, Goals, and Expectations Through Technical Assistance

1. ED program officers and technical assistance providers should host a series of local community meetings and workshops to: (a) explain the goals and objectives of the reauthorized ESEA and the implications for Title IX, Indian parent committees, and Indian education in general; (b) clarify common misunderstandings; and (c) respond to specific questions and concerns that exist among LEA staff and members of the American Indian community.

Many educators, parents, and other members of the American Indian community are unclear about the goals and objectives of the reauthorized ESEA, and some question whether the legal changes will ultimately result in improved educational services for American Indian students. To address existing questions and concerns, federal program officers and technical assistance providers should

open lines of communication and facilitate a dialogue around key issues. Each meeting or workshop with grantees should allow sufficient time for participants to raise questions and discuss issues and for technical assistance providers to address any misinformation circulating among LEAs and within the Indian education community. Targeted groups should include representatives from the education departments of tribal governments, leaders of national and state Indian education organizations, participants at Indian education conferences, and local Title IX staff. In addition, Indian parent committee members--who must approve any schoolwide project, teachers, and the staff of other local and federal education programs who work with American Indian students should also be involved in these meetings (e.g., Title I, Title VII). Everyone--not only Title IX staff--needs to have a solid understanding of the respective roles that different components of the system are expected to play in meeting the culturally related academic needs of American Indian students.

2. ***The formula grant application and technical assistance materials should provide clear and consistent definitions of key concepts that help Title IX grantees improve their understanding of comprehensive planning. Concrete models should define and illustrate: coordination, culturally related academic needs, content and performance standards, and program goals and benchmarks. These models should be developed and disseminated as part of the formula grant application and through federally sponsored technical assistance.***

Because the reauthorized ESEA represents a dramatic shift in expectations for Title IX projects (e.g., Title IX will coordinate with other programs, integrate project activities with the regular school program, align project objectives with content and performance standards), Title IX staff who understand the intent of the legislation and who support its goals may still find it difficult to implement the significant changes required under the law. For this level of attitudinal, organizational, and programmatic change to occur, district staff need intensive--and perhaps, long-term--assistance that goes beyond explaining the content and rationale for the reauthorized law. Assistance and training should include: clear definitions of terms; concrete suggestions and strategies for initiating and continuing ongoing comprehensive planning; models of successful comprehensive planning in varied school settings; and solutions for problems that Title IX staff have experienced in working with other school and district staff. Workshops in which participants develop their own plans and solutions through an interactive process facilitated by the technical assistance provider could also increase the usefulness of the assistance provided.

The means by which this kind of effective technical assistance is delivered can vary widely. For example, assistance providers may: offer direct, on-site training within districts, states, or regions; distribute descriptive materials that are written in a modular format to focus on specific questions from

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LEAs and parents; communicate updated information via the Internet and web sites; and offer assistance over the telephone.

3. Assistance provided to LEAs should meet the varying needs of school districts that differ significantly in terms of their enrollment size and the concentration of American Indian students in attendance.

ED program officers and technical assistance providers should provide varied program models for meeting the requirements of the new law. For example, a good Title IX comprehensive plan from a large, urban public school district with only a few American Indian students may differ from a good plan submitted by a rural reservation school that serves only American Indian students. Technical assistance providers should discuss the various ways that programs can be made to operate effectively in small, medium, and large districts with varying concentrations of American Indian students. Technical assistance should include varied models for meeting expectations for standards-based programming, goal-setting and benchmarking, assessment, and the other components of comprehensive planning.

4. Federally sponsored technical assistance providers should provide professional development to practitioners (e.g., teachers, state and district administrators and program coordinators, parents) on integrating culture and language with high standards and the learning of academic skills.

Professional development that provides materials, information, and training in methods for adopting and promoting an integrated approach to Indian education is needed in many LEAs. The isolation of culture from academics, and of Indian education in general from the mainstream operation of schools and districts, is far too prevalent. Although many projects try to "teach culture" in an isolated context, very few Title IX project staff and regular district staff seem to know how to integrate culturally relevant curricula and instructional strategies into a school's core academic program. It will not be enough to tell Title IX staff to hold students to "high academic standards" and, at the same time, attend to their "culturally related academic needs." Staff must develop and implement teaching strategies that use culture as a resource for learning and achieving academically.

5. Federally sponsored technical assistance providers should provide technical help in assessment and program evaluation by defining a common language for standards-based assessment and by identifying assessment strategies that are consistent with state and local content standards and with local Title IX program goals and benchmarks.

Under the reauthorized ESEA, districts are expected to assess periodically the progress of all American Indian students in the LEA on standards-based assessment instruments. The results of these assessments must be distributed to the parents of Indian students and the LEA community. However, local programs, districts, and communities will need guidance in understanding the differences between traditional assessments and newer approaches and how new assessments provide evaluation information on both individual students and the program as a whole. In addition, a common language is needed to describe how standards-based assessment can be useful in planning student programs and in evaluating Indian education programs. Finally, educators will need to be able to provide parents and community members with easily understood data and be able to answer questions about the purposes and usefulness of the new assessment tools.

Increase Participation and Linkages Among LEAs, SEAs, and the American Indian Community in Addressing the Needs of American Indian Students

6. Federal program officers and technical assistance providers should consider strategies for broadening the participation of Title IX staff, tribal government representatives, parent committee members, and other members of the American Indian community in the development of Goals 2000 plans, state consolidated plans, local comprehensive plans, and other state and local education reform efforts.

Broadening the involvement of American Indian parents and educators in the development of education reform efforts at the state and local levels would help to achieve three desirable goals. First, it would reduce the sense of isolation and "separateness" experienced by Indian education program participants in many school districts. This goal is particularly important as districts try to create integrated education programs that meet the needs of all students efficiently, effectively, and without duplication of services. This goal can only be realized if there is mutual awareness of district plans and activities among the staff of all programs. Second, including the voices of American Indians in program planning and development will help to ensure that the initiatives that are implemented will meet the needs of American Indian students and address their educational and cultural concerns. In

turn, this development can help to improve relationships between schools and American Indian parents, encouraging parents to increase their participation and involvement in other aspects of school life.

As part of this effort, ED's officers in charge of administering the various categorical programs and technical assistance providers can do the following:

- Inform the staff of local categorical programs that Title IX staff should be involved in all districtwide planning activities--including consolidated planning--and that everyone should be aware of the Indian education program's goals and activities.

  Although Title IX participation is not required by law, Title IX staff should be aware of what other programs are doing and, at a minimum, should receive written summaries of the related decisions or plans that are developed.

- Encourage SEA staff who either administer federal education programs or participate in reform efforts (e.g., curriculum development, staff development, standards development) to invite representatives from state or national Indian education organizations to participate on special committees or in suitable advisory or planning capacities.

  In the absence of state-level representation for Title IX, these individuals could help to ensure that two-way communication of relevant concerns and information occurs between local Title IX projects and SEAs. This initiative would also have the added benefit of developing the relationships among local Title IX projects and other members of the American Indian education community.

- Encourage LEAs with significant American Indian populations to invite representatives from the education departments within local tribal governments to participate in school improvement meetings, Goals 2000 planning meetings, or other local education reform efforts.

  In many communities, tribal officials have limited knowledge of what is happening in local schools, leaving them with scant opportunities to contribute to the education process.

- Locate and disseminate materials--to LEAs and SEAs--that describe the goals and standards (e.g., National Education Goals for American Indian and Alaska Natives) already developed by American Indian organizations such as the Navajo Nation and the National Indian Education Association.

  Technical assistance providers should assist district and state officials in incorporating these documents into state and local standards development activities.

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7. ***ED and SEAs should keep Title IX grantees informed about state and local content and performance standards. Where feasible, states and districts should provide opportunities for Title IX staff and other members of the Indian education community (e.g., representatives from the education departments of tribal governments, American Indian language experts) to be involved in the development of such standards.***

Not only do Title IX grantees need to be kept apprised of local- and state-level progress in standards development, but many will require technical assistance to modify projects and existing goals and objectives so that they incorporate appropriate content and performance standards. Including Title IX staff and other members of the Indian education community in standards development efforts will help to ensure that the standards are viewed as relevant (i.e., areas of importance to American Indian educators and students are attended to) and are accepted by the community.

8. ***ED should set challenging but reasonable goals and benchmarks through progress indicators so that all stakeholders--teachers, administrators, monitors, parents, and tribal communities--can use them to assess program and student progress.***

Under the reauthorized ESEA, the goals and expectations established for American Indian students should be as challenging as those established for all other students. However, by focusing exclusively on student outcome indicators, one may overlook the incremental gains that are being made by students who, while falling short of established goals, are still making steady progress; hence, appropriate process indicators may also be needed. In addition, indicators of the quality of the educational services that are provided by individual Title IX projects and by the larger school program (e.g., the content of the educational materials, the quality of instruction provided) should also be monitored. If students within an LEA are failing to achieve established goals after a reasonable amount of time, identifying the possible reasons might prove easier if these types of process indicators are already being monitored.

References

Council of Chief State School Officers. (1995, March). States' status on the development of content and performance standards. Washington, DC: Author.

Indian Nations At Risk Task Force. (1991, October). Indian nations at risk: An educational strategy for action: Final report of the Indian Nations At Risk Task Force. Washington, DC: U.S. Department of Education.

Exhibits

1. Data Sources Used in the Study

2. Number of Title IX Applications, by State, That Do Not Refer to the Required Components of the Comprehensive Plan

3. Number of Title IX Applications, by State, That Address Specific Goals

Exhibit 1
Data Sources Used in the Study[1]

State	Number of Local Title IX Applications Reviewed	Number of Local Title IX Program Representatives Interviewed	Number of Local Goals 2000 Plans Reviewed	State Goals 2000 Representatives Interviewed	State Indian Education Representatives Interviewed
Alaska	6	1	3	Yes	Yes
Arizona	20	4	2	Yes	Yes
California	16	2	6	Yes	Yes
New York	6	2	0	Yes	Yes
North Carolina	7	1	5	Yes	Yes
North Dakota	9	2	4	Yes	Yes
Oklahoma	50	3	0	Yes	Yes
Washington	16	3	0	Yes	Yes
Wisconsin	8	1	1	Yes	Yes
TOTAL	138	19	21	9	9

[1] In addition, representatives from five national and local Indian education organizations were interviewed.

Exhibit 2
Number of Title IX Applications, By State, That Do Not Refer to the Required Components of the Comprehensive Plan

State	Number of LEAs in Study Sample	Comprehensive Plan Not Mentioned[1]	Number of Applications That Do Not Mention Required Components of Title IX Comprehensive Plans[2]								
			Other Local or State Program Goals	Content Standards	Coordination	Performance Goals	Performance Benchmarks	Professional Development	Assessment of Title IX Participants	Assessment of ALL Indian Students	Plans for Sharing Performance Results
Alaska	6	0	2 (33%)	5 (83%)	2 (33%)	2 (33%)	1 (17%)	2 (33%)	1 (17%)	2 (33%)	3 (50%)
Arizona	20	8 (40%)	8 (40%)	14 (70%)	6 (30%)	4 (20%)	4 (20%)	7 (35%)	0	12 (60%)	12 (60%)
California	16	6 (19%)	7 (44%)	11 (69%)	7 (44%)	2 (13%)	3 (19%)	5 (31%)	1 (6%)	8 (50%)	6 (38%)
New York	6	3 (50%)	4 (67%)	6 (100%)	3 (50%)	0	2 (33%)	4 (67%)	2 (33%)	4 (67%)	2 (33%)
North Carolina	7	3 (43%)	5 (71%)	3 (43%)	4 (57%)	1 (14%)	2 (29%)	1 (14%)	2 (29%)	2 (29%)	4 (57%)
North Dakota	9	5 (56%)	5 (56%)	8 (89%)	4 (44%)	2 (22%)	4 (44%)	6 (67%)	1 (11%)	2 (22%)	3 (33%)
Oklahoma	50	26 (52%)	26 (52%)	39 (78%)	30 (60%)	7 (14%)	13 (26%)	29 (58%)	1 (2%)	29 (58%)	23 (46%)
Washington	16	8 (50%)	5 (31%)	14 (88%)	12 (75%)	9 (56%)	11 (69%)	8 (50%)	1 (6%)	12 (75%)	8 (50%)
Wisconsin	8	6 (75%)	5 (63%)	8 (100%)	3 (38%)	3 (38%)	3 (38%)	5 (63%)	0	3 (38%)	5 (63%)
TOTAL	138 (100%)	65 (47%)	67 (49%)	108 (78%)	71 (51%)	30 (22%)	43 (31%)	67 (49%)	9 (7%)	74 (54%)	66 (48%)

[1] Counts shown here include applications that did not mentioned the term "comprehensive plan." However, although an application may not have mentioned the term "comprehensive plan," it may have addressed one or more of the required components in the project narrative or elsewhere in the application.

[2] Counts shown here include applications that did not refer to the required components.

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Exhibit 3
Number of Title IX Applications, By State, That Address Specific Goals

State	Number of LEAs in Study Sample	Enrollment Size of LEAs Reviewed			Number of Applications That Address Goals of:					
		Small	Medium	Large	Improving Academics	Dropout Prevention	Counseling	Cultural Enrichment	Parent Involvement	Other[1]
Alaska	6	0	32	3	5 (83%)	1 (17%)	4 (67%)	4 (67%)	2 (33%)	1 (17%)
Arizona	20	4	7	9	16 (80%)	7 (35%)	7 (35%)	9 (45%)	7 (35%)	
California	16	5	6	5	15 (94%)	6 (38%)	8 (50%)	12 (75%)	3 (19%)	2 (13%)
New York	6	2	2	2	3 (50%)	4 (67%)	2 (33%)	5 (83%)	2 (33%)	
North Carolina	7	2	2	3	6 (86%)	3 (43%)	1 (14%)	6 (86%)	1 (14%)	
North Dakota	9	1	5	3	9 (100%)	4 (44%)	1 (11%)	5 (56%)	1 (11%)	
Oklahoma	50	13	23	14	46 (92%)	12 (24%)	14 (28%)	25 (50%)	7 (14%)	10 (20%)
Washington	16	5	7	4	15 (94%)	10 (63%)	10 (63%)	14 (88%)	9 (56%)	
Wisconsin	8	3	3	2	6 (75%)	4 (50%)	2 (25%)	5 (63%)	2 (25%)	
TOTAL	138 (100%)	35 (25%)	58 (42%)	45 (33%)	121 (88%)	51 (37%)	49 (36%)	85 (62%)	34 (25%)	13 (9%)

[1] "Other" category includes career awareness/orientation activities, financial assistance to low-income students to purchase school supplies, technical skills enhancement, and physical skills enhancement.

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